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CHLOROBENZENE PRODUCERS ASSOCIATION

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2001 JUN 28 AM 9:38Re: OPPTS-00274D -- Commitment for *para*-dichlorobenzene (CAS No. 106-46-7)

Dear Sir or Madam:

I am writing on behalf of the Chlorobenzene Producers Association (CPA), an industry association composed of three United States producers and an importer of chlorobenzene chemicals,¹ in response to letters written May 31, 2001 by the Administrator and May 16, 2001 by the Acting Assistant Administrator to our member companies, requesting their participation in the Voluntary Children's Chemical Evaluation Program (VCCEP) (65 Fed. Reg. **81700** (December 26, 2000)).

CPA, as a consortium on behalf of its member companies, hereby commits to sponsor *para*-dichlorobenzene (*p*-DCB) (CAS No. 106-46-7) in Tier I of the pilot VCCEP. CPA will evaluate available existing hazard and exposure data for *p*-DCB under Tier I of the VCCEP and, if necessary, develop data where gaps in Tier I information exist.

¹ CPA is an industry association organized as a special project of the Synthetic Organic Chemical Manufacturers Association. The following companies are presently members of CPA: Bayer Corporation; Metachem Products, LLC; PPG Industries, Inc.; and Solutia Inc.

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CPA will commence developing these data by no later than December 24, 2001 and will provide the Tier I assessment for *p*-DCB by no later than June 25, 2002.²

The technical contact for CPA is as follows:

Edward W. Kordoski, MBA, Ph.D.

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² As noted in CPA's June 26, 2000 comments on EPA's "Straw Proposal" for a Voluntary Children's Chemical Evaluation Program, CPA believes that certain of the chlorobenzene chemicals in the VCCEP Pilot are not appropriate candidates for VCCEP testing. Accordingly, CPA does not plan to sponsor two of the listed chemicals for VCCEP testing. Chlorobenzene (monochlorobenzene) is not used in consumer products, nor is it used in other applications that are likely to lead to disproportionate exposure to children, and exposure levels identified by EPA are generally less than the limit of detection. Similarly, *meta*-dichlorobenzene is not used in consumer products or in applications likely to lead to disproportionate exposure to children, and data cited in the VCCEP program regarding exposure to this substance were confounded by EPA's inability to distinguish between *meta*- and *para*-dichlorobenzene. In all likelihood, these data reflect exposure to *para*-dichlorobenzene and not *meta*-dichlorobenzene. Thus, exposure data cited by EPA regarding *meta*-dichlorobenzene are highly questionable. Further explanation of CPA's views regarding those substances is found in CPA's detailed comments on EPA's Straw Proposal. CPA has long supported testing of the chlorobenzenes, and for over 30 years has conducted substantial health and environmental effects testing for those chlorobenzenes that are sold as commercial products, both on a voluntary basis and pursuant to test rules. Large quantities of test data for these chemicals have been submitted to EPA since 1979. Moreover, CPA is sponsoring both chlorobenzene and *meta*-dichlorobenzene as part of the HPV challenge program. Because there is considerable overlap between the HPV program and Tier 1 of the VCCEP, CPA has already committed to make much of the requested hazard information for these substances available to EPA and the public through the HPV program.

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Very truly yours,

Edward W. Kordoski, MBA, Ph.D.
on behalf of the
Chlorobenzene Producers Association

cc: CPA Member Companies